

**LUCAS COUNTY COMMON PLEAS COURT**

CORNER ADAMS & ERIE STREETS  
TOLEDO, OHIO 43604

**SUMMONS  
CIVIL ACTION**

RECEIVED DEC 18 2023

**FILING TYPE:**

**OTHER CIVIL**

AMERICAN RED CROSS  
1111 RESEARCH DR  
TOLEDO, OH 43614

G-4801-CI-0202304635-000  
JUDGE: GARY G COOK

You have the right to seek legal counsel. If you cannot afford a lawyer, you may contact the Legal Services of Northwest Ohio. If you do not qualify for services by the Legal Services of Northwest Ohio and do not know an attorney you may contact the Toledo Bar Association's Lawyer Referral Service (419) 242-2000.

You have been named as a defendant in a Complaint filed in this Court by the plaintiff named below. A copy of the Complaint is attached to this Summons.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he has no attorney of record, a copy of an answer to the complaint, within twenty-eight (28) days after you receive this Summons, exclusive of the of the day of service or to an amended complaint within the remaining response time to the complaint or 14 days, whichever period may be longer. Your answer must be filed with the Clerk of Court of Common Pleas within three (3) days after the service of a copy of the Answer on the plaintiff's attorney.

If you fail to serve and file your Answer, judgment by default will be rendered against you for the relief demanded in the Complaint.

PLAINTIFF (S)

MARK BUFORD  
6143 BAHAMAR ROAD  
TOLEDO, OH 43611

ATTORNEY FOR PLAINTIFF(S)

PRO SE

BERNIE QUILTER  
CLERK OF COURTS

Date: December 14, 2023

 , Clerk



**IF YOU DO NOT HIRE AN ATTORNEY  
PLEASE READ & RESPOND**

(mark one & respond)

☐

I request to be notified by email

My email address \_\_\_\_\_

**OR**

☐

I request to be notified by regular mail  
(Clerk will forward to Court for approval)

My mailing address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Send email to:** Lwatt@co.lucas.oh.us  
**Subject:** G-4801-CI-0202304635-000  
AMERICAN RED CROSS  
**Message:** Your email address

**Return this Form with your address to:**  
Clerk of Court  
Lucas County Common Pleas Court  
700 Adams  
Toledo, OH 43604

**If you do NOT hire an attorney & fail to respond  
you will NOT receive notification of events related to this case**

Case Information is available Online at:  
[www.co.lucas.oh.us/Clerk](http://www.co.lucas.oh.us/Clerk)  
click on the "Dockets Online" link

*Local Rule 5.05 H. SERVICE BY CLERK'S OFFICE Once journalized, the Clerk of courts Office will transmit the entries to the email address submitted by the parties. Counsel for a party or Pro Se litigant representing themselves who do not have an email address may, by motion, request ordinary mail service of entries by the Clerk of Courts Office.*

RECEIVED DEC 18 2023

FILED  
LUCAS COUNTY

2023 DEC 13 AM 11:41

IN THE LUCAS COUNTY, OHIO COURT OF COMMON PLEAS

**G-4801-CI-0202304635-000**

**Judge**

**GARY G. COOK**

Mark Buford  
6143 Bahiamar Road  
Toledo, Ohio 43611  
Plaintiff

CASE NO. \_\_\_\_\_

JUDGE  
COMPLAINT With  
REQUEST FOR JURY TRIAL

American Red Cross  
1111 Research Dr.  
Toledo, OH 43614  
Defendant

.....  
Now comes, Mark Buford, pro se, and files this complaint against the defendant, American Red Cross.

The plaintiff states the following as his basis for filing this Complaint:

1. The Plaintiff is a resident of Lucas County, Ohio and filed a charge pursuant to Ohio Revised Code Chapter 4112.051.
2. The Plaintiff is a member of two protected class: sex, being male and age, DOB March 27, 1960.
3. The Defendant is a corporation located in Toledo, Lucas County, Ohio and was the plaintiff's employer beginning on April 20, 1998.
4. The Plaintiff was terminated on or about November 17, 2022.
5. The Plaintiff states that he was denied employee benefits, promotion and other benefits of employment due to his age and sex, while other employees who were afforded such v benefits.
6. Plaintiff filed a complaint with the Ohio Civil Rights Commission on or about November 28, 2022.
7. Plaintiff received a right to sue letter from the Ohio Civil Rights Commission on or about September 18<sup>th</sup> 2023.
8. Defendant reduced his job opportunities by not including him in training opportunities and allowing him to work remotely while allowing others to do so.

9. Additionally, the Defendant unilaterally reduced his job assignments of blood drives which effectively reduced his ability to carry out his job duties.
10. Plaintiff was harassed on several occasions while in the employment of the Defendant that made his work environment hostile.
11. In summation, the Defendant attempted to completely change my position and eliminate my primary responsibility of being a liaison to the labor unions which have sponsored blood drives in the area, there was a constant environment of being treated differently, resulting in anxiety and stress on the job.

WHEREFORE, Plaintiff requests this Court finding the Defendant in violation of the Ohio Revised Code 4112, reinstatement of my job and damages for loss wages and for any other relief at law and in equity.

Respectfully submitted,



---

Mark Buford, pro se

TO THE CLERK:

Please forward a copy of the Complaint to the Plaintiff:

American Red Cross  
1111 Research Dr.  
Toledo, OH 43614